

# State Water Contractors

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January 28, 2002

Mr. Len Marino  
 Department of Water Resources  
 State Water Project Analysis Office  
 1416 Ninth Street  
 P.O. Box 942836  
 Sacramento, CA 94236-0001

Re: Preliminary Draft Study Plan Package Review FERC Project 2100

Mr. Marino:

The State Water Contractors (SWC) commends the Department of Water Resources (DWR) and all Participants in the Alternative Licensing Process (ALP) for the Oroville Facilities (FERC Project 2100) for their efforts in developing the set of Study Plans released for review on December 11, 2001. A comprehensive and focused set of Study Plans is key to the success for the ongoing ALP for the Oroville Facilities. The SWC appreciates the opportunity afforded by the ALP to actively participate in the relicensing of the Oroville Facilities. The SWC is pleased to respond to DWR's request for comments on the Preliminary Draft Study Plan Package. As outlined in the Preliminary Draft Study Plan Package, the SWC is dividing its comments into overarching concerns appropriate for Plenary Group input and more detailed comments that will be directed to Work Group discussions. This document provides a snapshot of SWC's overarching concerns to the Plenary Group. The SWC will provide detailed comments and edits on individual Study Plans in the Work Group meetings.

### 1. Necessary Additional Studies

SWC recommends that DWR prepare a Study Plan in the Engineering & Operations Work Group that will analyze the impact(s) on water supply and generation that may occur with implementation of proposed Protection, Mitigation, and Enhancement measures (PM&E). Information acquired in this study will provide information necessary to complete the engineering exhibits in the Application for New License.

2. Geographic Boundaries - Phased "Reasonable"

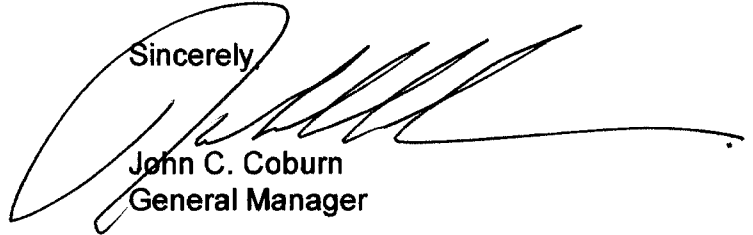
The SWC encourages DWR to work within and across Work Groups to refine the geographic scope as the studies program proceeds. SWC suggests that the Participants in the ALP "agree to disagree" with regard to some of the positions taken on geographic scope and approve an adaptive approach to reaching consensus to facilitate early implementation of the Study Plans.

3. Need for Terms and Definitions

The SWC strongly recommends that DWR develop and provide a comprehensive glossary of standard terms and conditions. To date, Study Plans include a variety of terms that may lead to unnecessary duplication of effort and potential problems in analyzing data.

Thank you for addressing our comments on the December 11, 2001 Preliminary Draft Study Plan Package.

Sincerely,

A handwritten signature in black ink, appearing to read 'John C. Coburn', with a long horizontal flourish extending to the right.

John C. Coburn  
General Manager

Cc:SWC Member Agencies  
SWC FERC Relicensing Ad Hoc Committee